

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: SLABBED NEW MEDIA, LLC
 Debtor**

**CHAPTER 11
CASE NO. 15-50963-KMS**

**MOTION TO EXTEND DEBTOR'S TIME TO REMOVE
CAUSES OF ACTION**

COMES NOW Slabbed New Media, LLC, (the "Debtor"), and files this its *Motion to Extend Debtors Time to Remove Causes of Action* (the "Motion"), and in support thereof, would show unto the Court the following, to-wit:

1. On June 16, 2015, the Debtor herein filed with this Court its Voluntary Petition for reorganization under Chapter 11 of the Bankruptcy Code.

2. In conjunction with this Chapter 11 case, the Debtor is aware that certain pre-petition claims may exist (and possibly post-petition claims as well), either directly or indirectly against the Debtor, that may need to be removed pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure.

3. In order to fully protect the Debtor's rights regarding all pre-petition causes of action and/or claims (pending as of the filing of this Motion), and/or all post-petition claims, the Debtor respectfully seeks herein to extend the time for removing pre and post-petition causes of action pursuant to Rule 9027 an additional ninety (90) days from August 14, 2015, up to and including November 15, 2015.

4. The Motion filed herein is in the best interest of all creditors and parties-in-interest and the extension sought herein is not sought for the purposes of unreasonable delay.

5. The Debtor submits that, in light of the relief requested, a Preliminary Order should be entered in the event objections are filed prior to the time a final hearing may be held on this matter.

6. Other grounds to be assigned upon a hearing hereof.

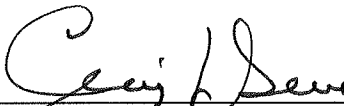
WHEREFORE, the Debtor respectfully prays that upon a hearing hereof, this Honorable Court will grant the Motion and extend the time within which to remove causes of action for ninety (90) days. The Debtor prays for other such general and specific relief as the Court may deem just.

This, the 14th day of August, 2015.

Respectfully submitted,

SLABBED NEW MEDIA, LLC

By Its Attorneys,
LAW OFFICES OF CRAIG M. GENO, PLLC

By: 
Craig M. Geno

OF COUNSEL:

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CERTIFICATE OF SERVICE

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal, Esq.
Office of the United States Trustee
christopher.steiskel@usdoj.gov

This, the 14th day of August, 2015.


Craig M. Geno